

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

|                          |   |                                  |
|--------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA | ) | SUPERSEDING INDICTMENT NO.       |
|                          | ) | 4:22-cr-016                      |
|                          | ) |                                  |
| v.                       | ) | 18 U.S.C. § 1349                 |
|                          | ) | Conspiracy to Commit Wire Fraud  |
|                          | ) |                                  |
|                          | ) | 18 U.S.C. § 287                  |
| SHAQUANDRA WOODS,        | ) | False, Fictitious, or Fraudulent |
| COURTNEY GILCHRIST, and  | ) | Claims                           |
| KENNETH JACKSON          | ) |                                  |
|                          | ) | 18 U.S.C. § 1001(a)(3)           |
|                          | ) | False Document                   |
|                          | ) |                                  |
|                          | ) | 18 U.S.C. § 1001(a)(2)           |
|                          | ) | False Statement                  |

**MOTION FOR A NEW SCHEDULING ORDER**

1.

Recently the defendant, Shaquandra Woods was served with another five hundred and fifty-six (556) new pages of discovery.

2.

The discovery needs to be read and analyzed to determine what new issues it presents for the presentation of the case. All of this discovery now needs to be gone over with the defendant. The Defendant lives in Jacksonville, FL. The new information needs to be investigated.

3.

The new information may require more defense motions based upon what it contains. Research needs to be done to determine what if any motions would be proper to file at this time. The defendant needs time to gather any possible rebuttal evidence to this new discovery.

4.

If defense counsel had known that these five hundred and fifty-six (556) pages of new discovery were going to be disclosed after the most recent status conference report, then the status conference report from the defendant's perspective would have been completely different. The defendant needs a new scheduling order in order to properly evaluate, prepare for, and deal with this new discovery disclosure of five hundred fifty-six (556) pages of discovery. Defense counsel has been complaining about document dumping to the government during this entire process. There is no quick way to go through this discovery and deal with it without some additional time and without an additional scheduling order. Counsel has seen so much recent document dumping in federal criminal litigation that he has removed himself from federal criminal litigation. Finding meaningful discovery in federal criminal litigation has become similar to searching for a needle in a haystack.

5.

For all of the above and foregoing reasons, the defendant requests a new scheduling order be entered. The original scheduling order was only entered after the government had indicated that they had given us all of the discovery.

This 8<sup>th</sup> day of May, 2023.

Respectfully submitted,

/s/ Jacque D. Hawk

Jacque D. Hawk

Georgia Bar No.: 338755

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

|                          |   |                           |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA | ) |                           |
|                          | ) |                           |
| VS.                      | ) |                           |
|                          | ) |                           |
| SHAQUANDRA WOODS         | ) | CASE NUMBER: 4:22-CR-0016 |
|                          | ) |                           |
| DEFENDANT                | ) |                           |

**CERTIFICATE OF SERVICE**

This is to certify that I have on this day served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”) which was generated as a result of electronic filing.

Submitted this 8<sup>th</sup> day of May, 2023.

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